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 DEPARTMENT OF STATE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

UNITED STATES DEPARTMENT OF)	CASE NO. 19-cv-04094-HSG
STATE,)	
)	STIPULATION AND ORDER CONTINUING
Plaintiff,)	CERTAIN PRETRIAL FILING DATES
)	
v.)	
)	
BRUCE OWEN and ALEXANDRA OWEN,)	
)	
Defendants.)	

Pursuant to Civil Local Rule 7-12, plaintiff United States Department of State (“Plaintiff”) and defendants Bruce and Alexandra Owen (“Defendants”), by and through their undersigned counsel, hereby STIPULATE and respectfully REQUEST as follows:

On October 6, 2020, the Court vacated the October 27, 2020 pretrial conference and November 9, 2020 trial dates in this action. ECF No. 66 (“Order”). The Court ordered that “all other filing deadlines, including motions in limine and pretrial filings, remain in effect and based on the October 27 pretrial and November 9 trial dates.” *Id.* The Court also ordered the parties to “be prepared to try this case promptly once circumstances related to the COVID-19 pandemic permit, and the Court will set a trial in 2020 if at all possible.” *Id.*

Pursuant to the Order, the parties’ deadline to file motions in limine remained October 6, 2020, and Plaintiff filed *Daubert* challenges to exclude Defendants’ expert witnesses. ECF Nos. 67, 68.

Defendants will file any opposition by October 13, 2020. Based on the now-vacated October 27, 2020 pretrial conference date, the parties' remaining pretrial filings will also be due on October 13, 2020.

The parties respectfully submit that it would serve the interests of judicial economy and help conserve the parties' resources if the Court continued these remaining pretrial filings (except Defendants' opposition to Plaintiff's *Daubert* challenges) by one week, from October 13, 2020 to **October 20, 2020**, which will be after the Court hears the parties' cross-motions for summary judgment on October 15, 2020. *See* ECF No. 58. The parties respectfully submit that this continuance will allow them to benefit from any guidance provided by the Court during the summary judgment hearing regarding what issues are left in the case, if any, as well as provide additional time for the parties to complete all pretrial tasks and joint submissions to ensure there will be an effective and efficient presentation of issues at trial. The parties respectfully submit that a one-week continuance of pretrial filing dates will aid their preparation to try this case promptly as soon as circumstances related to the COVID-19 pandemic permit.

SO STIPULATED.

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

Dated: October 7, 2020

By: /s/ Savith Iyengar
SAVITH IYENGAR
Assistant United States Attorney
Attorneys for Plaintiff

By: **/s/ Daniel Berko
DANIEL BERKO
Attorney for Defendants

** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document has obtained approval from this signatory.

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ORDER

IT IS HEREBY ORDERED that Defendants will file any opposition to Plaintiff's motions to exclude Defendants' expert witnesses, ECF Nos. 67, 68, by October 13, 2020. The deadline for the parties' remaining pretrial filings is continued from October 13, 2020 to **October 20, 2020**.

SO ORDERED.

Dated: 10/8/2020


HON. HAYWOOD S. GILLIAM JR.
United States District Judge